

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

UNIVERSAL LIFE CHURCH MONASTERY
STOREHOUSE, a Washington non-profit
corporation,

Plaintiff,

v.

MAURICE KING, LEWIS KING,
GLEN YOSHIOKA, DYLAN WALL,
SARA WHITE, and AMERICAN
MARRIAGE MINISTRIES, a Washington
non-profit corporation,

Defendants

AMERICAN MARRIAGE MINISTRIES, a
Washington non-profit corporation,
Counter-Claimant/
Third-Party Plaintiff,

v.

UNIVERSAL LIFE CHURCH MONASTERY
STOREHOUSE, a Washington non-profit
corporation; and UNIVERSAL LIFE
CHURCH MONASTERY STOREHOUSE,
INC., a Washington non-profit corporation,
Counter-Defendants/
Third-Party Defendants.

Case No. 2:19-CV-00301-RSL

**DECLARATION OF ANNE COHEN
IN SUPPORT OF
AMERICAN MARRIAGE
MINISTRIES' RESPONSE TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

The Honorable Robert S. Lasnik

**NOTED FOR: July 10, 2020
ORAL ARGUMENT REQUESTED**

**DECLARATION OF ANNE COHEN ISO
AMM'S RESPONSE TO ULC'S MSJ
Case No. 2:19-CV-00301-RSL**

**FOSTER GARVEY P.C.
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- 1 1. My name is Anne Cohen. I represent the defendants in this lawsuit, including American
2 Marriage Ministries.
- 3 2. Plaintiff Universal Life Church Monastery Storehouse (“ULC”) has refused to provide
4 any discovery in response to AMM’s Second Set and Third Sets of Requests for
5 Production until and unless it is compelled to do so by the Court.
- 6 3. In approximately the past week, ULC has produced over 1,500 new pages of discovery:
7 some as compelled by the Court’s Order (Dkt. 113) on AMM’s First Motion to Compel,
8 and some based on a supplemental search of ULC’s records. AMM has had little chance
9 to review, much less follow up on or seek to depose witnesses about, these newly
10 produced documents, which have more than doubled the number of documents ULC
11 has contributed to the case record.
- 12 4. Attached as **Exhibit 1** is a true and accurate copy of documents my office obtained
13 from King County’s public records entitled Findings Of Fact, Conclusions of Law and
14 Order of Judgment in Superior Court of Washington for King County, Case No. 85-2-
15 06736-3, captioned *State of Washington ex. rel. Norm Maleng v. George Freeman, The*
16 *Universal Life Church, Inc. The Monastery, et. al.*
- 17 5. Attached as **Exhibit 2** is a true and accurate copy of documents produced by ULC bates
18 labelled ULC Mnstry 514 - 522. These documents and are filed under seal due to their
19 designation by ULC as “CONFIDENTIAL – ATTORNEYS EYES ONLY”.
- 20 6. Attached as **Exhibit 3** is a true and accurate copy of documents produced by ULC bates
21 labelled ULC Mnstry 1508 –1512. These documents are filed under seal due to their
22 designation by ULC as “CONFIDENTIAL – ATTORNEYS EYES ONLY”.
- 23 7. Attached as **Exhibit 4** is a true and accurate copy of documents produced by ULC bates
24 labelled ULC Mnstry 1513 – 1518. These documents are filed under seal due to their
25 designation by ULC as “CONFIDENTIAL – ATTORNEYS EYES ONLY”.

- 1 8. Attached as **Exhibit 5** is a true and accurate copy of documents produced by ULC bates
2 labelled ULC Mnstry 1520 – 21. These documents are filed under seal due to their
3 designation by ULC as “CONFIDENTIAL – ATTORNEYS EYES ONLY”.
- 4 9. Attached as **Exhibit 6** is a true and accurate copy of a document produced by ULC
5 bates labelled ULC Mnstry 657. This document is filed under seal due to the
6 designation by ULC as “CONFIDENTIAL”.
- 7 10. Attached as **Exhibit 7** is a true and accurate copy of documents produced by ULC bates
8 labelled ULC Mnstry 1556 – 001557. These documents are filed under seal due to their
9 designation by ULC as “CONFIDENTIAL – ATTORNEYS EYES ONLY”.
- 10 11. Attached as **Exhibit 8** is a true and accurate copy of documents produced by ULC bates
11 labelled ULC Mnstry 1577 – 001579. These documents and are filed under seal due to
12 their designation by ULC as “CONFIDENTIAL – ATTORNEYS EYES ONLY”.
- 13 12. Attached as **Exhibit 9** is a true and accurate copy of a document produced by ULC
14 bates labelled ULC Mnstry 649. This document is filed under seal due to the
15 designation by ULC as “CONFIDENTIAL”.
- 16 13. Attached as **Exhibit 10** is a true and accurate copy of documents produced by ULC
17 bates labelled ULC Mnstry 534 – 535. These documents filed under seal due to their
18 designation by ULC as “CONFIDENTIAL”.
- 19 14. Attached as **Exhibit 11** is a true and accurate copy of documents produced by ULC
20 bates labelled ULC Mnstry 578 – 579. These documents are filed under seal due to their
21 designation by ULC as “CONFIDENTIAL”.
- 22 15. Attached as **Exhibit 12** is a true and accurate copy of documents produced by ULC
23 bates labelled ULC Mnstry 601 –602. These documents are filed under seal due to their
24 designation by ULC as “CONFIDENTIAL”.
- 25

1 16. Attached as **Exhibit 13** is a true and accurate copy of a document produced by ULC
2 bates labelled ULC Mnstry 665. This document is filed under seal due to the
3 designation by ULC as “CONFIDENTIAL”.

4 17. Attached as **Exhibit 14** is a true and accurate copy of documents produced by ULC
5 bates labelled ULC Mnstry 666 – 669. These documents are filed under seal due to their
6 designation by ULC as “CONFIDENTIAL.”

7 18. Attached as **Exhibit 15** is a true and accurate copy of documents my office obtained by
8 taking a screenshot of the contents of:
9 <https://web.archive.org/web/20140517074234/http://americanmarriageministries.com/>
10 (the WayBack Machine) for the website located at americanmarriageministries.com as
11 of May 17, 2014. A copy of this document has been bates labelled AMM 3724 – 3725.

12 19. Attached as **Exhibit 16** is a true and accurate copy of excerpts from the testimony
13 provided by George Freeman.

14 20. Attached as **Exhibit 17** is a true and accurate copy of excerpts from the testimony
15 provided by Glen Yoshioka.

16 21. Attached as **Exhibit 18** is a true and accurate copy of a document produced by ULC
17 bates labelled ULC Mnstry 677.

18 22. Attached as **Exhibit 19** is a true and accurate copy of a document produced by ULC
19 bates labelled 000641. This document is filed under seal due to the designation of
20 “CONFIDENTIAL” by ULC.

21 23. Attached as **Exhibit 20** is a true and accurate copy of a document produced by ULC
22 bates labelled ULC Mnstry 544. This document is filed under seal due to the
23 designation of “CONFIDENTIAL” by ULC.

24 24. Attached as **Exhibit 21** is a true and accurate copy of a document produced by ULC
25 bates labelled ULC Mnstry 695.

25. Attached as **Exhibit 22** is a true and accurate copy of a document produced by ULC bates labelled ULC Mnstry 693.

26. Attached as **Exhibit 23** is a true and accurate copy of a document produced by ULC bates labelled ULC Mnstry 2534. This document is being filed under seal due to the designation by ULC as “CONFIDENTIAL.”

27. Attached as **Exhibit 24** is a true and accurate copy of a document produced by ULC bates labelled ULC Mnstry 2571. This document is being filed under seal due to the designation by ULC as “CONFIDENTIAL.”

28. Attached as **Exhibit 25** is a true and accurate copy of documents bates labelled AMM 3669-73. These documents were created by taking a screenshot of the contents located at: <https://www.themonastery.org/training/ordination/are-online-ordinations-legal> on April 24, 2020.

29. Attached as **Exhibit 26** is a true and accurate copy of a documents bates labelled AMM 3674-3677. These documents were created by taking a screenshot of the contents located at: <https://www.themonastery.org/training/ordination/what-is-ordination> on April 24, 2020.

30. Attached as **Exhibit 27** is a true and accurate copy of excerpts of the testimony provided by Dallas Goschie.

31. Attached as **Exhibit 28** is a true and accurate copy of excerpts of the testimony provided by Rhonda Harper.

32. Attached as **Exhibit 29** is a true and accurate copy of the documents produced by ULC in response to AMM’s Interrogatory Number 17.

33. Attached as **Exhibit 30** is a true and accurate copy of AMM’s Second Supplemental Answers, Responses and Objections to Plaintiff’s First Set of Interrogatories to Defendant American Marriage Ministries.

34. Attached as **Exhibit 31** is a true and accurate copy of AMM's Supplemental Answers and Objections to Plaintiff's Requests for Admission to Defendant AMM.

35. Attached as **Exhibit 32** is a true and accurate copy of Defendant AMM's First Set of Interrogatories and Requests for Production of Documents to Plaintiff with Plaintiff's Second Supplemental Responses Thereto.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED this 6th day of July 2020.

By: /s/ Anne Cohen
Anne Cohen, WSBA No. 41183

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2020, the foregoing **DECLARATION OF ANNE COHEN** was electronically filed with U.S. District Court for the Western District of Washington through the CM/ECF eFiling system.

I further certify that on July 6, 2020, I served a copy of the foregoing on:

Michael P. Matesky, II Matesky Law LLC 1001 4 th Ave., Suite 3200 Seattle, WA 98154 Fax: 206-701-0332 Email: litigation@mateskylaw.com <i>Attorneys for Plaintiff</i>	Michael B. Galletch Puget Sound Business & Litigation PLLC 411 University Street, Suite 1200 Seattle, WA 98101 Fax: --- Email: mike@psbizlit.com <i>Attorneys for Plaintiff</i>
Anne Cohen Sheeba Roberts Betts Patterson Mines P.C. 111 SW 5 th Ave., Suite 3650 Portland, OR 97204 Email: Acohen@bpmlaw.com sroberts@bpmlaw.com <i>Of Attorneys for Maurice King, Lewis King, Glen Yoshioka, Dylan Wall, Sarah White and American Marriage Ministries</i>	

_____ by mailing to each of the foregoing a copy thereof, placed in a sealed envelope addressed as listed above and deposited in the United States mail at Portland, Oregon, and that postage thereon was fully prepaid.

_____ by facsimile transmission to the number shown above.

 X by additional e-service through the E-Filing system, if party was registered.

 X by courtesy email to the email addresses shown above.

/s/ McKenna M. Filler

McKenna M. Filler

Legal Practice Assistant